Supreme Court, U.S.
FILED
JAN 25 2002
OFFICE OF THE CLERK

No. 01-1025

In The

Supreme Court of the United States

PARENTS AGAINST TESTING BEFORE TEACHING, an unincorporated association, *et al.*,

Petitioners,

versus

ORLEANS PARISH SCHOOL BOARD; GAIL MOORE GLAPION, in her official capacity as Board President; THE LOUISIANA STATE BOARD OF ELEMENTARY & SECONDARY EDUCATION; GLENNY LEE BUQUET, in her capacity as president of the State Board of Elementary and Secondary Education; CECIL PICARD, in his capacity as Louisiana's State Superintendent of Education,

Respondents.

On Petition For A Writ Of Certiorari To The United States Court Of Appeals For The Fifth Circuit

BRIEF IN OPPOSITION ON BEHALF OF RESPONDENTS, THE LOUISIANA STATE BOARD OF ELEMENTARY & SECONDARY EDUCATION; GLENNY LEE BUQUET, IN HER CAPACITY AS PRESIDENT OF THE STATE BOARD OF ELEMENTARY AND SECONDARY EDUCATION; AND CECIL PICARD, IN HIS CAPACITY AS LOUISIANA'S STATE SUPERINTENDENT OF EDUCATION

MICHAEL H. RUBIN (La. 10833)
Counsel of Record
McGLINCHEY STAFFORD, PLLC
9th Floor, One American Place
Baton Rouge, LA 70825
225-383-9000
Fax: 225-343-3076

COCKLE LAW BRIEF PRINTING CO., (800) 225-6964
OR CALL COLLECT (402) 342-2831

COUNTER-STATEMENT OF QUESTIONS PRESENTED

1. Did the district court properly dismiss the Petitioners' suit for failure to state a claim when:

   A. Courts uniformly have held that students have no "property right" to be promoted from one grade to the next, and without a property right there can be no due process violation; and

   B. The state and federal statutes relied upon by the Petitioners do not create private causes of action?

2. Did the appellate court have jurisdiction, and, if so, is this case now moot?

LIST OF PARTIES

Petitioners: Parties Plaintiff:

PARENTS AGAINST TESTING BEFORE TEACHING, an unincorporated association;

CHARMAINE BRYANT, individually and on behalf on her minor child, Krystal Bryant;

BRYANT SMOOT, STEPHEN SMOOT, individually and on behalf of their minor child, Lynette Smoot;

WAYNE THOMPSON, ROMONA THOMPSON, individually and on behalf of their minor children, Savannah Thompson and Stephen Thompson;

NATHANIAL BROWN, DIANE BROWN, individually and on behalf of their minor child, Irene Brown;

ALETHA FRANKLIN, INDIVIDUALLY and on behalf of her minor child, Dominique Franklin;

DIEDRA RAYFIELD, individually and on behalf of her minor child, Jessie Rayfield;

EVELYN MAGEE, MELVIN MAGEE, individually and on behalf of their minor child, Maurice Magee;

TAMAR ALLEN, individually and on behalf of her minor child, Daniel Allen; and

NAOMI MARK, individually and on behalf of her minor child, Tiffany Raines.

LIST OF PARTIES – Continued

Respondents: Party Defendants and Disclosure In Accordance with Rule 29.6

All of the Respondents are local or state governmental agencies and individuals who serve in official capacities with these agencies.

ORLEANS PARISH SCHOOL BOARD;

GAIL MOORE GLAPION, in her official capacity as Orleans Parish School Board President;

THE LOUISIANA STATE BOARD OF ELEMENTARY & SECONDARY EDUCATION;

GLENNY LEE BUQUET, in her capacity as President of the State Board of Elementary and Secondary Education; and

CECIL PICARD, in his capacity as Louisiana's State Superintendent of Education.

TABLE OF CONTENTS

Page

COUNTER-STATEMENT OF QUESTIONS PRESENTED i

LIST OF PARTIES ii

TABLE OF CONTENTS iv

TABLE OF AUTHORITIES v

COUNTER-STATEMENT OF THE CASE 1

PROCEEDINGS BELOW 1

COUNTER-STATEMENT OF FACTS 2

ARGUMENT 3

I. Federal Courts Consistently Have Held That There Is No Property Right In Promotion From One Grade To The Next 3

II. The Other Constitutional Cases Relied Upon By Petitioners Are Inapplicable 6

III. There Is No Private Cause Of Action Under The Statutes Relied Upon By Petitioners 8

A. There Is No Private Cause Of Action Under 20 U.S.C. §§ 5812 And 5886 8

B. La. R.S. 17:24.4 Does Not Create Or Support A Cause Of Action 9

IV. The Petitioners' Claims Are Moot 10

V. The Appellate Court Lacked Jurisdiction; The Notice Of Appeal Was Defective 12

CONCLUSION 13

TABLE OF AUTHORITIES

Page

CASES

Bester v. Tuscaloosa City Bd. of Educ., 722 F.2d 1514 (11th Cir. 1984) 4, 5

Bonner v. City of Prichard, 661 F.2d 1206 (11th Cir. 1981) (en banc) 6

Brookhart v. Illinois State Bd. of Educ., 697 F.2d 179 (7th Cir. 1983) 5, 6

Brown v. Board of Education, 347 U.S. 483 (1954) 8

City of Erie v. Pap's A.M., 529 U.S. 277 (2000) 10

Cort v. Ash, 422 U.S. 66 (1975) 9

Debra P. v. Turlington, 644 F.2d 397 (5th Cir. 1981), *reh. en banc den.*, 654 F.2d 1079 (5th Cir. 1981), *aff'd after remand*, 730 F.2d 1405 (11th Cir. 1984) ... 5, 6

DeFunis v. Odegaard, 416 U.S. 312 (1974) (per curiam) 11

Erik V. v. Causby, 977 F.Supp. 384 (E.D.N.C. 1997) 4

Goss v. Lopez, 419 U.S. 565 (1975) 7

Hartfield v. East Grand Rapids Pub. Sch., 960 F.Supp. 1259 (W.D. Mich. 1997) 4

Johnson v. Hardy, 98-2282 (La. App. 1 Cir. 11/5/99), 756 So.2d 328 9

Killion v. Burl, 860 F.2d 306 (8th Cir. 1988) 4

Kossick v. United Fruit Co., 365 U.S. 731 (1961) 2

Mahavongsanan v. Hall, 529 F.2d 448 (5th Cir. 1976) 5

Mills v. Green, 159 U.S. 651 (1895) 11

TABLE OF AUTHORITIES – Continued

Page

Nevares v. San Marcos Consol. Indep. Sch. Dist., 111 F.3d 25 (5th Cir. 1997) 7

Paul v. Davis, 424 U.S. 693 (1976) 4

Plyler v. Doe, 457 U.S. 202 (1982) 3

Price v. U-Haul Co. of La., 98-1959 (La. 9/8/99), 745 So.2d 593 10

San Antonio Indep. Sch. Dist. v. Rodriguez, 411 U.S. 1 (1973) 4, 8

Sandlin v. Johnson, 643 F.2d 1027 (4th Cir. 1981) 4

St. Pierre v. United States, 319 U.S. 41 (1943) 11

Theriot v. Midland Risk Ins. Co., 95-2895 (La. 5/20/97), 694 So.2d 184 9

Tinker v. Des Moines Indep. Cmty. Sch. Dist., 393 U.S. 503 (1969) 7

Transit Mgmt. of SE La., Inc. v. Group Ins. Admin., Inc., 226 F.3d 376 (5th Cir. 2000) 12, 13

STATUTES

20 U.S.C. § 5812 8

20 U.S.C. § 5812(3)(A) 8

20 U.S.C. § 5886 ..... 8, 9

MISCELLANEOUS

Fed. R. Civ. P. 58 12

La. Constitution, Art. I, § 2 10

La. R.S. 17:24.4 9

Pub. L. No. 106-113, Div. B, § 1000(a)(4), 113 Stat. 1535 8

COUNTER-STATEMENT OF THE CASE

PROCEEDINGS BELOW

Petitioners sought to delay implementation of a statewide test administered to them as fourth and eighth graders; passage of the test was required for those students to proceed to the next grade. Two groups of defendants were named: the State Defendants, consisting of the political governing body that oversees education statewide, its President, and the State Superintendent of Education;[1] and the New Orleans Defendants, consisting of the Orleans Parish School Board and its President.[2] The student plaintiffs also sought to compel their promotion to the next grade even though they had failed to achieve a satisfactory score on the test.

The Petitioners filed suit in state court; the matter was timely removed to the United States District Court for the Eastern District of Louisiana. The Respondents filed a motion to dismiss the complaint for its failure to state a claim as to which relief could be granted. The district court, after combining a hearing on the Fed. R. Civ. P. 12(b)(6) motion with Petitioners' request for a

---

[1] The State Defendants are: the Louisiana State Board of Elementary & Secondary Education; Glenny Lee Buquet, in her capacity as President of the State Board of Elementary and Secondary Education; and Cecil Picard, in his capacity as Louisiana's State Superintendent of Education.

[2] The New Orleans Defendants are the Orleans Parish School Board and Gail Moore Glapion, in her official capacity as Board President.

preliminary injunction,[3] dismissed the complaint (Pet. App. A-5). The United States Fifth Circuit Court of Appeals affirmed in an unpublished per curiam opinion (Pet. App. A-1).

COUNTER-STATEMENT OF FACTS

The "facts" considered on a motion to dismiss are the allegations in the complaint.[4] While there is a substantial dispute as to the accuracy of these allegations, at this point in the case the only thing pertinent is the complaint's allegations and whether they state a claim.

At its most basic, the complaint alleges two causes of action. First, the complaint asserts that fourth and eighth grade students have a "due process" right to be promoted to the next grade, although courts repeatedly have held there is no student property right in being promoted. Second, the complaint alleges various claims based on Louisiana and federal statutes, although nothing in these statutes creates a private cause of action and no court has ever held that a private cause of action exists under these

---

[3] The hearing was held on September 14, 2000. Because Rule 12(b)(6) motions to dismiss are based solely on the pleadings and evidence is not considered, the district court first heard oral arguments on the motions to dismiss. During oral argument, the district court determined that additional discovery was needed concerning Petitioners' Title VI claim. The district court therefore deferred ruling on the motion to dismiss and heard evidence on the Petitioners' request for a preliminary injunction (2 R. 18). The Petitioners later dismissed their Title VI claims. Pet. Brief, p. 10.

[4] *Kossick v. United Fruit Co.*, 365 U.S. 731, 732 (1961).

provisions. Based upon these assertions, Petitioners sought to delay implementation of the state-wide test, and they sought to be promoted to the next grade.

ARGUMENT

The petition for a writ of certiorari should be denied. All circuit and district courts addressing this issue have held that students do not have a property right in a promotion and thus there can be no due process violation in failing to promote those who fail to achieve a satisfactory score on a standardized test. There is neither a split in the circuits on this issue nor an important question of federal law upon which this Court should, but has not, ruled. Moreover, there is no private right of action, express or implied, under any of the statutes on which Petitioners rely, and one of those statutes has been repealed.

I. Federal Courts Consistently Have Held That There Is No Property Right In Promotion From One Grade To The Next.

This Court has held that "[p]ublic education is not a 'right' granted to individuals by the Constitution,"[5] for "[e]ducation, of course, is not among the rights afforded explicit protection under our Federal Constitution. Nor do we find any basis for saying it is implicitly so

[5] *Plyler v. Doe*, 457 U.S. 202, 221 (1982).

protected."[6] Because there is no independent constitutional right to a public education, in order to state a due process claim the Petitioners must establish a property or liberty interest of which they have been deprived.[7] There is no such interest.

The Fifth Circuit's ruling, below, is in line with the holdings of the Fourth,[8] Eighth,[9] and Eleventh Circuits,[10] as well as district courts,[11] that there is no constitutional right of promotion from one grade to the next.

---

[6] *San Antonio Indep. Sch. Dist. v. Rodriguez*, 411 U.S. 1, 35 (1973).

[7] The Petitioners' application cites *Paul v. Davis*, 424 U.S. 693 (1976), without argument. The case stands for the proposition that some generalized claim of damage, such as to one's reputation, does not create a property or liberty interest "sufficient to invoke the procedural protection of the Due Process Clause." 424 U.S. at 701. It in no way supports Petitioners' case and, indeed, demonstrates the fallacy of Petitioners' assertions.

[8] *Sandlin v. Johnson*, 643 F.2d 1027 (4th Cir. 1981) (holding that no constitutional issue is raised by failing to promote a student from one grade to the next).

[9] *Killion v. Burl*, 860 F.2d 306 (8th Cir. 1988) (holding that a student has no due process liberty or property interest in being promoted to the next grade).

[10] *Bester v. Tuscaloosa City Bd. of Educ.*, 722 F.2d 1514 (11th Cir. 1984) (no property right in being promoted from one grade to the next).

[11] *Erik V. v. Causby*, 977 F.Supp. 384 (E.D.N.C. 1997) (denying a preliminary injunction because there is no right to promotion); *Hartfield v. East Grand Rapids Pub. Sch.*, 960 F.Supp. 1259, 1265-66 (W.D. Mich. 1997) (no right to advancement to the ninth grade).

Petitioners' reliance on *Debra P.*[12] and similar diploma cases[13] is misplaced. Those cases dealt with twelfth grade and graduate students being denied a diploma. The fact that graduating students may have a property interest in receiving a diploma which allows them to terminate their education and receive a certificate which may have a value in the job market, however, is of no relevance to fourth and eighth grade students' claims that they have a purported "property right" to be promoted to the next grade. No fourth or eighth grader can claim the "right" to graduate upon completion of that grade – the right to end his or her education at that point. Indeed, the Eleventh Circuit in *Bester v. Tuscaloosa City Bd. of Educ.*, 722 F.2d 1514, 1516 (11th Cir. 1984), found no property right in promotion from one grade to the next and explicitly distinguished *Debra P.*, finding it inapplicable to promotion decisions based upon system-wide minimum reading standards. *Bester* held that "an expectation of the plaintiff students that the schools would continue to promote students performing in a substandard manner is not reasonable and cannot form the basis of a property right."[14]

---

[12] *Debra P. v. Turlington*, 644 F.2d 397 (5th Cir. 1981), *reh. en banc den.*, 654 F.2d 1079 (5th Cir. 1981), *aff'd after remand* (and after the split of the Fifth Circuit into the Fifth and Eleventh Circuits), 730 F.2d 1405 (11th Cir. 1984).

[13] Other diploma cases cited by the Petitioners in their brief were *Mahavongsanan v. Hall*, 529 F.2d 448 (5th Cir. 1976), and *Brookhart v. Illinois State Bd. of Educ.*, 697 F.2d 179, 181 (7th Cir. 1983).

[14] *Bester* is especially noteworthy in its distinguishment of the Fifth Circuit's opinion in *Debra P.*, for *Bester* occurred after the 1981 split of the Fifth and Eleventh Circuits and was decided

It should be noted that Petitioners misread *Brookhart v. Illinois State Bd. of Educ.*, 697 F.2d 179 (7th Cir. 1983), in alleging (Pet. Brief, p. 14) that the case centers on the age of the students; the issue in *Brookhart* was a test that was "a prerequisite to receipt of a diploma" in high school. 697 F.2d at 181. Therefore, *Brookhart* does not stand for the proposition that promotion decisions involve a property or liberty interest.

There is nothing extraordinary in the Fifth Circuit's ruling. It is in line with the unbroken chain of precedents holding that, because students do not possess a property interest in moving from one grade to the next, there is no due process issue that can form the basis of a cause of action. There is no issue here worthy of granting the writ of certiorari.

II. The Other Constitutional Cases Relied Upon By Petitioners Are Inapplicable.

Petitioners, unable to find any jurisprudence supporting their contention that a due process inquiry is triggered when fourth and eighth grade students are not promoted, apparently attempt to argue by analogy by citing, without any detailed discussion, other cases that

---

under a rule that made Fifth Circuit precedent (including *Debra P.*) binding on the Eleventh Circuit. *Bonner v. City of Prichard*, 661 F.2d 1206 (11th Cir. 1981) (*en banc*). The ruling in *Bester* occurred one year before the Eleventh Circuit itself affirmed *Debra P.* (a case arising in Florida), for *Debra P.* was appealed a second time to the Eleventh Circuit after having been remanded to the district court by the Fifth Circuit following the first appeal.

deal with education. None of these cases provide any support for Petitioners' theory.

Petitioners' reliance on discipline cases, such as *Goss v. Lopez*, 419 U.S. 565 (1975), is without merit. *Goss* involved a due process claim relating to the procedures for expulsion and suspension of high school students for misconduct. *Goss'* holding, relating to students who were being barred from the classroom, has no relevancy to the Petitioners here who are being educated in school, who are not being suspended or excluded from school. This distinction was pointed out in *Nevares v. San Marcos Consol. Indep. Sch. Dist.*, 111 F.3d 25, 26 (5th Cir. 1997), involving a student who had been detained by police for aggravated assault and who was then transferred out of regular classes into an alternative program. The student relied upon *Goss*, but *Nevares* held it was inapplicable, because, unlike *Goss*, the student was "not being denied access to public education, even temporarily." *Id.* The students in the instant case are not being deprived of an education either; they are continuing with their studies.

Likewise, Petitioners' citation of a First Amendment case such as *Tinker v. Des Moines Indep. Cmty. Sch. Dist.*, 393 U.S. 503 (1969), is inapposite. The holding and language of the case on a student's First Amendment freedom of speech and expression have nothing to do with educational promotions and testing, and the case has no relevancy whatsoever to the instant situation.[15]

---

[15] As this Court stated, "Our problem lies in the area where students in the exercise of First Amendment rights collide with the rules of the school authorities." *Tinker*, 393 U.S. at 507.

Finally, Petitioners' citation of *Brown v. Board of Education*, 347 U.S. 483 (1954), and of the failed equal protection attack on Texas' method of funding public schools through a property tax system, *San Antonio Indep. Sch. Dist. v. Rodriguez*, 411 U.S. 1 (1973), have no bearing here. The constitutional issues presented by Petitioners in their application are based solely on due process grounds. Pet. Brief, p. (i).

III. There Is No Private Cause Of Action Under The Statutes Relied Upon By Petitioners.

A. There Is No Private Cause Of Action Under 20 U.S.C. §§ 5812 And 5886.

Petitioners' reliance on 20 U.S.C. § 5886 is curious, to say the least. This statute was *repealed* effective September 30, 2000.[16] In any event, this provision was merely a funding statute, requiring states to take certain initiatives if they wished to receive an allocation of federal monies. The statute did not contain a substantive requirement that the state use multiple methods of evaluating students.

20 U.S.C. § 5812 ("National Education Goals") is not a mandate but rather an aspirational statement, encouraging states to assure that students leave the fourth, eighth, and twelfth grades having "demonstrated competency over challenging subject matter, including English [and] mathematics . . . "[17] This is precisely what the Louisiana test does for fourth and eighth graders. Neither

---

[16] Pub. L. No. 106-113, Div. B, § 1000(a)(4), 113 Stat. 1535.

[17] 20 U.S.C. § 5812(3)(A).

this statute nor 20 U.S.C. § 5886 expressly provides for a private right of action, and neither passes this Court's four-factor test for implying a private right of action. *See, Cort v. Ash*, 422 U.S. 66 (1975).

B. La. R.S. 17:24.4 Does Not Create Or Support A Cause Of Action.

Petitioners' brief asserts, without citation of any authority, that there is a state constitutional issue arising from La. R.S. 17:24.4. The statute provides that the Louisiana Department of Education shall establish a definitive level for student proficiency. In the event a student fails to meet this level, the Department of Education is required to establish an intervention plan to assist the student in achieving the required level. This intervention may include retention in grade. The statute does not provide for any private cause of action.

Louisiana courts routinely have held that if a statute does not expressly provide for a private right of action, then one does not exist. *See, e.g., Johnson v. Hardy*, 98-2282 (La. App. 1 Cir. 11/5/99), 756 So.2d 328, 334 ("We conclude that if the legislature had intended such a result [for a private cause of action], it would have included language expressly recognizing such a cause of action . . . ").[18]

---

[18] *Accord: Theriot v. Midland Risk Ins. Co.*, 95-2895 (La. 5/20/97), 694 So.2d 184, 193, where the Louisiana Supreme Court held that a private right of action expressly granted in one portion of a statute could not be applied to other portions of the statute. The reason was that "the expression of legislative intent

Petitioners' state due process constitutional arguments based on this statute fare no better than their federal due process claim. Under the Louisiana constitution, just as under the United States Constitution, a due process inquiry is triggered only by a deprivation of a property interest.[19] No such interest exists here, either for students or their parents.

IV. The Petitioners' Claims Are Moot.

While this case is not worthy of certiorari, those opposing certiorari have an obligation to inform the Court about potential mootness of the Petitioners' application. *City of Erie v. Pap's A.M.*, 529 U.S. 277, 288 (2000).

Petitioners' complaint did not seek to eliminate the use of the test; rather, they merely sought a delay in its being administered and sought to be promoted to the next grade despite not having received satisfactory scores on the March 2000 test.

A year and a half of schooling has passed for the student Petitioners who were in the fourth and eighth

---

in those instances [in the statute] is express and unambiguous. In the absence of an equally clear expression of legislative will, we are unwilling to adopt a more expansive interpretation" applying the limited private right of action to other areas of the statute.

[19] La. Constitution, Art. I, § 2: "No person shall be deprived of life, liberty, or property, except by due process of law." *Price v. U-Haul Co. of La.*, 98-1959 (La. 9/8/99), 745 So.2d 593, 594 ("An essential requirement in any due process challenge is that the claimant must show that some property or liberty interest has been affected.").

grades when the suit was filed in August 2000. The argument that they should not be retained in their grade for school year 2000-2001 is moot because the 2000-2001 school year is complete. Even assuming, *arguendo*, that the Petitioners had a cause of action, an appeal must be dismissed when it is impossible for the Court to grant "any effectual relief whatever." *Mills v. Green*, 159 U.S. 651, 653 (1895). This court sustained a similar mootness argument in *DeFunis v. Odegaard*, 416 U.S. 312 (1974) *(per curiam)*, a challenge to constitutionality of a law school admissions process when the petitioner was about to complete his studies at the time certiorari was sought and would be allowed to complete his studies regardless of the outcome of the petition.

The argument that the Petitioners here did not have sufficient notice of the test is likewise moot, for if they had to retake the LEAP test again in March 2001,[20] they had ample time to prepare for it.

Finally, the argument that the use of the test attaches a " 'stigma' of failure" (Pet. Brief, p. 24) creates no justiciable controversy at this point. The students have gone through a year and a half of school since the suit was filed. Any alleged "stigma" already has occurred.[21] A purported stigma does not overcome mootness. As this Court held in *St. Pierre v. United States*, 319 U.S. 41, 43 (1943), in finding moot a challenge to a contempt citation when the sentence had been completed prior to the time

---

[20] The tests are administered in March; *see* Pet. Brief, p. 7.

[21] The Respondents do not concede that any such stigma has in fact occurred.

that certiorari was granted, "the moral stigma of a judgment which no longer affects legal rights does not present a case or controversy for appellate review."

V. The Appellate Court Lacked Jurisdiction; The Notice Of Appeal Was Defective.

While the Fifth Circuit found that it had jurisdiction to reach the merits of Petitioners' appeal, the question of jurisdiction will have to be addressed should certiorari be granted. The Petitioners' notice of appeal sought to appeal a minute entry, not a final judgment; their notice of appeal to the Fifth Circuit specifically limited the appeal to the September 19th minute entry and expressly excluded the October 10, 2000 judgment.[22] Even if Petitioners were attempting to appeal the minute entry dated September 14, 2000 and entered on September 19, 2000 (R. 27-28), this minute entry is not a final judgment and does not meet Fed. R. Civ. P. 58's requirements for a judgment.

---

[22] The notice of appeal (1 R. 3, emphasis supplied) provides:

> Notice is hereby given that Parents Against Testing Before Teaching, et al., plaintiffs in the above-named complaint, hereby appeal to the United States Court of Appeals for the Fifth Circuit from the Judgment of this Honorable Court rendered herein *on the 19th day of September 2000* with respect to plaintiffs' constitutional claims and federal and state statutes. *This appeal does not pertain to the Court's October 10, 2000 Judgment* wherein this Honorable Court granted plaintiffs' Unopposed Motion to Dismiss Title VI Claims without prejudice and plaintiffs reserving the right to reurge said claims.

Transit Mgmt. of SE La., Inc. v. Group Ins. Admin., Inc., 226 F.3d 376, 382 (5th Cir. 2000).

CONCLUSION

The petition for writ of certiorari should be denied because Petitioners do not meet any of the usual and customary criteria for a writ of certiorari, and the matter is now moot. Further, the notice of appeal below was fatally defective.

By Attorneys:

MICHAEL H. RUBIN
(La. Bar No. 10833)
Counsel of Record
McGLINCHEY STAFFORD, PLLC
9th Floor One American Place
Baton Rouge, LA 70825
Phone: 225-383-9000
Fax: 225-343-3076